



*Transcript and Related Exhibits with Certain Redactions* [Doc. 72, Page ID# 1595].

4. With the indulgence and approval of the Court, counsel would propose that the limited number of Daigle deposition pages at this time be filed under seal so as not to delay the Court's ability to consider the Defendants' pending dispositive motions and Plaintiff's *Reply*.

5. It is the intention and expectation of counsel to have additional meet and confer conference calls in an effort to timely produce and file a *Proposed Joint Pre-Trial Order* to comply with the Court's *Scheduling Order* [Doc. 24, PageID #: 240]. Such conference calls will provide the opportunity for counsel to the Defendants to consider Plaintiff's continued position that the now reduced number of Daigle deposition pages cited in Dahl's pleadings should be filed in the public record or otherwise identify why those Daigle deposition pages should remain sealed with a designation of "Confidential" pursuant to the *Joint Protective Order* [Doc. 26, PageID #: 254].

Respectfully submitted,

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